

# EXHIBIT F

5/23/24, 5:43 PM

RE: Doe v. Delaware Valley Regional High School

Thu May 23 2024 17:43:44 GMT-0400 (Eastern Daylight Time)

**Subject:** RE: Doe v. Delaware Valley Regional High School  
**From:** RShah@andersonshahlaw.com  
**Date:** 5/20/2024 1:53 PM  
**To:** ron@mnblawfirm.com  
**Cc:** Matthew.Lynch@law.njoag.gov, helana@mnblawfirm.com  
**Matter:**  
-Type or Select Matter/Lead-

Ron,

I'm not going to delay this, I want to get to the deposition phase. Ok, we'll re-serve it.

**From:** Ron Berutti <ron@mnblawfirm.com>  
**Sent:** Monday, May 20, 2024 1:40 PM  
**To:** Roshan Shah <RShah@andersonshahlaw.com>  
**Cc:** Matthew.Lynch@law.njoag.gov; Helana Farley <helana@mnblawfirm.com>; dpirozzoli@yahoo.com  
**Subject:** RE: Doe v. Delaware Valley Regional High School

I said I would agree to it as a compromise. Your demand for a privilege log is not a compromise. Likewise, your assertion that you are withdrawing "without prejudice" fails to recognize that your subpoena exceeded the scope of the Order. While you may wish to consider such withdrawal to be "without prejudice," in no way do we agree that you have any right to subpoena such information under the Order, meaning that the withdrawal is a withdrawal with prejudice.

Regarding service, I have no authority to agree that your revised subpoena does not need to be properly served. It would be up to you to deal with the third parties in such regard. Thus, I will make this final offer to you:

1. Re-serve the subpoenas with a modified Exhibit A that is limited to medical records and credentials, together with a letter providing that the prior subpoena is withdrawn.
2. The subpoenas must be served no later than tomorrow before Noon so that there are no more delays.
3. No other qualifications to the withdrawal shall be made and you can reserve your right to attempt to obtain such information in the future with permission of the Court.

Thank you.